

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION; AU OPTRONICS
CORPORATION; AU OPTRONICS
CORPORATION AMERICA; TATUNG
COMPANY; TATUNG COMPANY OF
AMERICA, INC.; AND VIEWSONIC
CORPORATION,

Defendants.

Civil Action No. 06-726-GMS

DEMAND FOR JURY TRIAL

**DEFENDANTS TATUNG COMPANY AND TATUNG
COMPANY OF AMERICA'S NOTICE OF JOINDER IN
VIEWSONIC CORPORATION'S MOTION TO STRIKE**

Tatung Company and Tatung Company of America (collectively the "Tatung Defendants") by and through its undersigned counsel hereby joins (the "Joinder") in the Motion to Strike filed by ViewSonic Corporation (the "Motion"). (D.I. 114). In support of their Joinder, the Tatung Defendants state:

BACKGROUND

On or about December 1, 2006, LPL initiated this action by filing its Complaint for Patent Infringement against Chi Mei Optoelectronics Corporation ("Chi Mei"), AUO, AUOA, the Tatung Defendants, and ViewSonic Corporation ("ViewSonic"). The original complaint asserts claims against all of the defendants, including the Tatung Defendants, for the alleged infringement and/or induced infringement of U.S. Patent No. 5,825,449 ("the '449 Patent"), U.S. Patent No. 4,624,737 ("the '737 Patent"), and U.S. Patent No. 5,019,002 ("the '002 Patent") (collectively "the Patents") (See D.I. 1)

Four and a half months later, on April 11, 2007, LPL filed its First Amended Complaint adding three declaratory relief claims on three new patents only as against AUO and AUOA.¹ (See D.I. 29.). Again, on May 22, 2007, without leave of Court to file a second amended pleading, LPL filed a third initial pleading – also entitled First Amended Complaint, but against defendants Chi Mei and Chi Mei Optoelectronics USA, Inc. ("Chi Mei USA") ("Second First Amended Complaint"). (See D.I. 54.)

In this Second First Amended Complaint, LPL added Chi Mei USA as a new party, plus two additional counts of declaratory relief for invalidity and non-infringement on four (4) new patents. This Second First Amended Complaint, however, dropped LPL's declaratory relief claims against AUO and AUOA previously asserted in the original First Amended Complaint. (See, e.g., D.I. 54 at ¶¶ 7, 50-62).

JOINDER

The Tatung Defendants concur with the factual and legal arguments set forth in the Motion to Strike as to why the First Amended Complaint and Second First Amended Complaint should be stricken. Accordingly, the Tatung Defendants file this Joinder in support of the Motion.

CONCLUSION

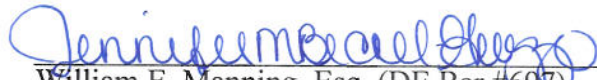
For all the reasons set forth in the Motion to Strike (D.I. 114), the Tatung Defendants request that this Court grant the Motion.

¹ The new AUO patent cluster includes the '781 Patent, the '160 Patent, and the '629 Patent (the "AUO Patents"). See D.I. 29, Ex. D, E and F.

DATED: July 20, 2007

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC



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